



CDSS

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ARNOLD SCHWARZENEGGER
GOVERNOR

September 27, 2010

Linda Haugan, Assistant County Administrator
San Bernardino County Human Services System
385 N. Arrowhead Drive, 5th Floor
San Bernardino, CA 92415-0140

Dear Ms. Haugan:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of June 7-10, 2010. I apologize for the delay in transmitting the results of that review. Enclosed is the final report on the review.

There were some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Jim Tashima, Acting Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Denise Shefchik, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Richard Trujillo, CDSS Supplemental Nutrition Assistance Program
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SAN BERNARDINO COUNTY
HUMAN SERVICES SYSTEM**

Conducted June 7-10, 2010

**California Department of Social Services
Human Resources Management Division**

Civil Rights Bureau

744 P Street, MS 8-16-70

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Reviewer

Mary Rockwood

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the San Bernardino County Human Services System with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

Interviews with selected public contact staff were held by telephone prior to the on-site review, which was conducted on June 7-10, 2010. An exit interview was held with administrative staff on June 10, 2010.

The 2010 review was conducted in the following locations:

Facility	Address	Programs Reviewed	Languages spoken by a substantial number of clients
Twentynine Palms TAD	73629 Sun Valley Drive.	CalWORKS; NAFS	English & Spanish
Yucca Valley TAD	5657 Pima Trail	CalWORKS; NAFS	English & Spanish
DelRosa TAD & ESP	1585 E. Highland Ave., Highland	CalWORKS; NAFS; Employment Services	English & Spanish
San Bernardino DAAS	685 E. Mill St.	IHSS	English & Spanish
San Bernardino DCFS	1504 Gifford St.	Children's Services: ER; FM/FR	English & Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2010-2011 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Case file reviews
- Facility inspections
- Review of Program Manager Surveys

Below is a summary of the sources of information used for the report:

Interviews Conducted with Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers/Supervisor	6	(5)
Lobby Receptionist/Supervisor.	3	(0)
Social Worker	4	(2)
Employment Services Specialist	1	(1)
Total	14	(8)

Case File Review (Total 128 cases)

English speakers' case files reviewed	07
Non-English or limited-English speakers' case files reviewed	121
Undocumented/Unable to determine	0
Languages of non-English cases	Spanish, Vietnamese,, Russian, Korean, Tagalog, Cambodian

Program Manager Surveys

Number of surveys distributed	6
Number of surveys received	6

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. Any required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a discussion of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Staff make special appointments with clients as needed to accommodate their work schedules.
Does the county have extended hours to accommodate clients?				See Above
Can applicants access services when they cannot go to the office?	X			Alternatives include access via the telephone, mail and home visits when necessary. E-Apps (electronic application) over the internet are being utilized in some programs.
Does the county ensure the	X			Outreach is conducted by

awareness of available services for individuals in remote areas?				McChoice staff, which is an innovative staff approach to community awareness.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs"?	X			The pamphlet is an established part of the intake and annual packets.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			The distribution is made routinely and discussion is included with the orientation sessions.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			The alternative formats were maintained by reception staff in the lobby.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			Translated instructional and informational material was provided in the threshold language of Spanish.

B. Corrective Actions: None required.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the ADAAG in the Corrective Action column refers to the federal Standards for Design, and the Title 24 of California Code and Regulations (T24 CCR) are also cited because there are instances when California state law is more stringent than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR), and Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Facility Location # 1: Twentynine Palms TAD – 73629 Sun Valley Drive

Facility Element	Findings	Corrective Action
Parking	There was no additional signage posted for the "Minimum \$250 Fine" for unauthorized parking in accessible spaces.	For both posted or wall mounted signage, additional language below the symbol sign shall state "Minimum Fine \$250". (CA T24 1129B.4.1)
Building Entrance	The door pressure measured at 15 pounds to enter the building.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

Facility Element	Findings	Corrective Action
Reception Lobby	Entrance was limited, but review was suspended, due to scheduled remodel to begin June 17, 2010.	Complete remodel of lobby area.
Accessible Restrooms	Both the men's and women's restrooms were missing the required wall signage.	In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)

Facility Location # 2: Yucca Valley TAD- 5657 Pima Trail

Facility element	Findings	Corrective Action
Parking	<p>1. The words "No Parking" were not provided in the access aisles of the disabled parking spaces.</p> <p>2. The number of accessible parking spaces was 10, but the designated van-accessible spaces did not total enough to meet requirements.</p> <p>3. There was no additional signage posted for the "Minimum \$250 Fine" for unauthorized parking in accessible spaces.</p>	<p>1. "No Parking" is to be painted on the ground in each 5' or 8' aisle in white letters no smaller than 12". (CA T24 1129B.4.1 &2)</p> <p>2. One in every 8 accessible spaces and no less than 1 shall be served by an access aisle 96" wide minimum placed opposite the driver's side and shall be designated Van-Accessible. (CA T24 1129.B.4.2, ADA 4.1.2(5)(b))</p> <p>3. For both posted or wall mounted signage, additional language below the symbol sign shall state "Minimum Fine \$250". (CA T24 1129B.4.1)</p>
Building Entrance	1. The amount of force/pressure required to	1. Force to open doors, exterior and interior, shall be 5 pounds maximum

Facility element	Findings	Corrective Action
	open the entrance doors exceeded standards. Pressured measured 14 and 12 pounds for the double set of doors.	[CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Restrooms	<p>1. Signage on the door and wall adjacent to both the men's and women's restroom did not meet requirements.</p> <p>2. The hand drier in both the men's and women's accessible restrooms were mounted too high (at 48" and 46"from the floor).</p> <p>3.The pressure on both the men's and women's restroom doors was too high (approx. 18 pounds).</p> <p>4. There was no insulation on the hot water pipe in the women's restroom.</p>	<p>1. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)</p> <p>2. Dispensing fixtures are to be mounted no higher than 40" from the floor. CA ACRM 1115B.9.2 and CA-ACRM 11115B.9.1.2, ADA 4.19.6)</p> <p>3. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]</p> <p>4.Hot water and drain pipes are to be insulated under lavatories, with no sharp or abrasive surfaces. (CA T24 1115B.4.7.1; ADA 4.24.6)</p>

Facility Location # 3: Del Rosa Facility – 1585 E. Highland Ave., Highland

Facility element	Findings	Corrective Action
Parking	1. The words "No Parking" were not provided in the access aisles of the disabled	1. "No Parking" is to be painted on the ground in each 5' or 8' aisle in white letters no smaller than 12".

Facility element	Findings	Corrective Action
	<p>parking spaces.</p> <p>2. There was no warning sign regarding "unauthorized parking" in the designated accessible parking spaces.</p> <p>3. There was no additional signage posted for the "Minimum \$250 Fine" for unauthorized parking in accessible spaces.</p>	<p>(CA T24 1129B.4.1 &2)</p> <p>2. Additional signage shall be posted in a conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Signage shall be 17" by 22" minimum in size with lettering 1" minimum high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. (CA T24 1129B.5).</p> <p>3. For both posted or wall mounted signage, additional language below the symbol sign shall state "Minimum Fine \$250". (CA T24 1129B.4.1)</p>
Restrooms	<p>1. Signage on the door and wall adjacent to both the men's and women's restroom did not meet requirements.</p> <p>2. Several dispensing fixtures were mounted too high:</p> <p>Men: Paper Towels @ 46" Soap @ 50" Toilet Seat Covers @ 53"</p> <p>Women: Soap @ 60" Toilet Seat Covers @ 49"</p>	<p>1. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6)</p> <p>2. Dispensing fixtures are to be mounted no higher than 40" from the floor. CA ACRM 1115B.9.2 and CA-ACRM 11115B.9.1.2, ADA 4.19.6)</p>

Facility element	Findings	Corrective Action
	3.The pressure on both the men's and women's restroom doors was too high (approx. 15 pounds).	3. Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

Facility Location #4: San Bernardino DAAS – 686 E. Mill St.

Facility element	Findings	Corrective Action
Parking	There was no additional signage posted for the "Minimum \$250 Fine" for unauthorized parking in accessible spaces.	For both posted or wall mounted signage, additional language below the symbol sign shall state "Minimum Fine \$250". (CA T24 1129B.4.1)
Restrooms	Door and wall signage was excellent. The door pressure, while exceeding standards, indicated that ongoing attention is given to maintaining accessibility.	Continue to monitor and adjust door pressure as appropriate.

Facility Location # 5: San Bernardino DCFS – 1504 Gifford Ave.

Facility element	Findings	Corrective Action
Parking	1. There was no warning sign regarding "unauthorized parking" in the designated accessible parking spaces.	1. Additional signage shall be posted in a conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Signage shall be 17" by 22" minimum in size with lettering 1" minimum high, stating: "Unauthorized vehicles parked in designated accessible spaces not

Facility element	Findings	Corrective Action
	2. There was no additional signage posted for the "Minimum \$250 Fine" for unauthorized parking in accessible spaces.	displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. (CA T24 1129B.5). 2. For both posted or wall mounted signage, additional language below the symbol sign shall state "Minimum Fine \$250". (CA T24 1129B.4.1)
Building Entrance	The door pressure was measured at approximately 12 pounds.	Force to open doors, exterior and interior, shall be 5 pounds maximum [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]
Restrooms	1. Signage on the door and wall adjacent to both the men's and women's restroom did not meet requirements. 2. The pressure on both the men's and women's restroom doors was too high (approx. 12 & 15 pounds).	1. In addition to the international symbol centered on doors at a height of 60" above the floor (CA T24 1115B.5), signage for gender identification shall be installed on the wall adjacent to the latch outside of the door. If there is no space, the sign shall be placed on the nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) 2. Force to open doors, exterior and interior, shall be 5 pounds maximum. [CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)]

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient). Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language

needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action be in the individuals' primary language.

A. Findings from Staff Interviews and Case File Reviews

Question	Yes	No	Sometimes	Comments
Does the county identify a client's language need upon first contact? How?	X			Each facility is staffed with bilingual reception staff that assist in identifying the language of choice. The "I speak" card is an available tool for use if needed.
Does the county use a primary language form?		X		With the interactive interview process during intake and annual reviews, staff are able to directly input client choices into the automated case recording system. Additionally, a "flag" placed on every case that includes a non-English speaker or one with any other special need for assistance.
Does the client self-declare on this form?	N/A			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Bilingual staffing provides excellent verbal bilingual services for the non-English-speaking clients and translated forms are readily available.
After it has been determined that the client	-	-	-	Non-English speaking clients are assigned to bilingual workers in most

Question	Yes	No	Some-times	Comments
is limited-English or non-English speaking, what is the county process for procuring an interpreter?				cases. When not possible, co-workers are used to assist in interpreting for the case worker.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			Bilingual workers are tested and certified by the agency.
Does the county have adequate interpreter services?	X			There is diversity in the workforce that provides interpreter service and the availability of the Language Line supplements this service.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			According to staff, it is preferred that agency interpreters be used, however, clients may use their own interpreters after the discussion with staff regarding the wisdom of using trained agency interpreters.
Does the county use the CDSS-translated forms in the clients' primary languages?	X	X		The use of Spanish forms was excellent; however, there were indications that staff may not consistently provide other translations that have been requested, even though made available by the State.
Is the information that is	X			

Question	Yes	No	Some-times	Comments
to be inserted into Notices of Action translated into the client's primary language?				
Does the county provide auxiliary aids and services, telecommunication devices for the deaf (TDDs) and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Publication 13)?	X			<p>TDD/TTY equipment is available and staff indicated that ASL interpreters would be available to assist a hearing impaired client who requested to use sign language. Staff tended, however, to state that passing notes would be the method of communication used with the hearing impaired.</p> <p>According to staff, the primary means to assist visually impaired clients would be to have a third party assist them by reading and signing documents for them. For those clients with sight, but limited visual functioning, staff mentioned using large fonts, copy machine enlargements and magnifying glasses as means to assist.</p>
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			In the course of processing, staff assist those clients who cannot read or write by reading to them and helping with the completion of forms.
Does the county offer screening for learning disabilities?	X			This occurs in the Welfare to Work Program.
Is there an established process for offering screening?	X			<p>The offer is made as part of the initial assessment process in CalWORKs employment services.</p> <p>NOTE: The screening tool is only made available to counties in English – thereby restricting the screening to English-speaking clients. This is not</p>

Question	Yes	No	Some-times	Comments
				considered a finding against the county and will be referred to CDSS program management.
Is the client identified as having a learning disability referred for evaluation?	X			Further testing and evaluation is provided when appropriate.

B. Corrective Actions

Area of Findings	Corrective Actions
Screening for Learning Disabilities restricted to English speakers.	Restricting the offer of screening for learning disabilities is a topic for CDSS to address and not a required corrective action for San Bernardino.
Provision of Translated Forms	When a client declares a choice for translated forms, San Bernardino County HSS must use and provide translated materials in the clients' primary languages when such forms are made available by CDSS. Div. 21-115.2

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documentation Item	Cal WORKs Cash Employment* <i>*see notes at end of section)</i>	Food Stamps (NAFS)	IHSS	CPS
Ethnic Origin	SAWS 1 + C-IV	DFA 285 A1 or SAWS 1 + C-IV	Soc 295	ER Initial Referral Form
Primary language	Saws 1 + C-IV	DFA 285 A1 or SAWS 1 + C-IV	Soc 295	ER Initial Referral Form
Method of providing bilingual services	Journal Narrative – This is only done by eligibility staff, however. The ESP Employment Services staff do not currently document when bilingual workers serve as interpreters	Journal Narrative –.	The case narrative comments were well documented when interpreters were utilized – bilingual social workers did an excellent job documenting when they served as the interpreter.	The case narrative comments were well documented when interpreters were utilized – bilingual social workers did an excellent job documenting when they served as the interpreter
Client provided own interpreter	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in sample	Case Narrative well documented.	N/A – only agency provided interpreters utilized.
Method to inform client of potential	Would be in narrative; no cases found in sample	Would be in narrative; no cases found in	Not a practice	N/A

problem of ineffective communication using own interpreter		sample		
Release of information to Interpreter	Signed Release Form would be in file.	Signed Release Form would be in file.	Signed Release Form	N/A
Individual's acceptance or refusal of written material offered in primary language	C-IV fields and narrative in journal template	C-IV fields and narrative in journal template	Not Documented	N/A
Translated NOAs contain translated inserts	Workers insert if C-IV does not print necessary detail	Workers insert if C-IV does not print necessary detail	Workers insert when necessary	N/A
Documentation of minor used as interpreter	N/A	N/A	N/A	N/A
Method of identifying client's disability	Would be Journal Entry if applicable	Would be Journal Entry if applicable	Narrative	Various Documents if applicable
Method of documenting a client's request for auxiliary aids and services	Would be Journal Entry if applicable	Would be Journal Entry if applicable	Narrative	

Additional Comments:

With the C-IV case recording system, both eligibility and employment services staff have access to the same documentation/information; therefore, the primary language (with the case "flag") is already in the system and available to all workers. Eligibility staff are now doing an excellent job in documenting interpreter services whether provided by the bilingual case worker, coworkers or others. It was found, however, that Employment

Services workers were not documenting when interpreter services were provided to the non-English speaking clients.

Note: Social Workers in both IHSS and CPS do an excellent job in documenting when language services are provided – both when they, as bilingual staff, or others serve as interpreters for non-English speaking clients.

B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided (Interpreters)	San Bernardino HHS must ensure that staff (including ESP) document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Staff receives civil rights training as new employees and subsequently every two years thereafter.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the employees seem knowledgeable about the	X			

cultural groups receiving services in their area?				
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B. Corrective Action: None Required

VIII: DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. The Civil Rights Coordinator primarily uses this log once complaints get to him/her.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			Staff were articulate in describing the remedies for the various types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	-	-	-	The complaint log will be reconciled against the data base of complaints maintained by the Civil Rights Bureau. Any discrepancy will be discussed with the CRC.

B. Corrective Action: None Required

IX. CONCLUSION

San Bernardino County's Health and Human Services Department (HHS) is in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 regulations, and other applicable state and federal civil rights laws. There was clear and consistent evidence that efforts continue to ensure staff recognize the civil rights program as an active and integral part of their case management responsibilities.

The current 2010 compliance review in San Bernardino County HHS was one of the most gratifying for this reviewer, because of the progress made in correcting prior deficiencies and because of the commitment by administrative staff and workers, themselves. The interviews were very informative and reflected professional staff who understood not only the specific requirements, but the reasons for those requirements. The Civil Rights Coordinator is to be commended for a job well done.

The findings addressed in the report were discussed at the exit meeting, with opportunity for open discussion. Case documentation is overall exceptional, with only the Employment Services Program lagging a bit in meeting the requirements for documentation of language services provided. Use of translated forms for languages other than Spanish is also an area to be given further attention. It was mentioned that C-IV system modifications may be necessary to allow generation of appropriate documents for languages other than Spanish.

The reviewer also noted that screening clients for learning disability is limited to English-speaking clients, due to absence of translated screening tools prepared by the State. The result is unequal opportunity for benefit from such screening. This issue will be brought to the attention of appropriate CDSS program managers.

San Bernardino County Health and Human Services Department must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.